


Statement of Basis

**Permit to Construct No. P-2016.0071
Project ID 61827**

**Walters Ready Mix, Inc.
Rexburg, Idaho**

Facility ID 065-00004

Final

**January 13, 2017
Tom Burnham 
Permit Writer**

The purpose of this Statement of Basis is to satisfy the requirements of IDAPA 58.01.01. et seq, Rules for the Control of Air Pollution in Idaho, for issuing air permits.

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ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

AAC	acceptable ambient concentrations for non-carcinogens
AACC	acceptable ambient concentrations for carcinogens
acfm	actual cubic feet per minute
AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
BMP	best management practices
Btu	British thermal units
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CAS No.	Chemical Abstracts Service registry number
cfm	cubic feet per minute
CFR	Code of Federal Regulations
CO	carbon monoxide
cy/day	cubic yards per day
cy/yr	cubic yards per consecutive 12-month period
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EL	screening emission levels
EPA	U.S. Environmental Protection Agency
gr	grain (1 lb = 7,000 grains)
HAP	hazardous air pollutants
hp	horsepower
hr/yr	hours per year
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometers
lb/hr	pounds per hour
lb/qtr	pound per quarter
m	meters
MACT	Maximum Achievable Control Technology
MMBtu	million British thermal units
NAAQS	National Ambient Air Quality Standard
NAICS	North American Industry Classification System
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
O&M	operations and maintenance
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
Rules	Rules for the Control of Air Pollution in Idaho
SIC	Standard Industrial Classification
SM	synthetic minor
SO ₂	sulfur dioxide
SO _x	sulfur oxides
T/day	tons per day
T/yr	tons per consecutive 12-calendar month period

T2	Tier II operating permit
TAP	toxic air pollutants
UTM	Universal Transverse Mercator
VOC	volatile organic compounds
yd ³	cubic yards
µg/m ³	micrograms per cubic meter

FACILITY INFORMATION

Description

The Walters Ready Mix, Inc. facility consists of two (2) major processes; sand and gravel processing and ready-mix concrete batching. Emissions from the facility include those associated with crushing and screening rock material; material transport; handling, and storage; storage silo baghouses; fuel storage tanks; and fugitive road dust.

Permitting History

The following information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

January 12, 1996	065-00004, Initial T2 permit for an existing concrete batch plant, Permit status (S)
October 17, 2001	065-00004, T2 renewal and remove a generator, Permit status (S)
June 23, 2010	T2-2007.0084, T2 modification and T2 renewal & removal of a diesel generator from the permit, Permit status (A, but expired, will become S upon issuance of this permit)

Application Scope

The facility has requested to convert the existing Tier II operating permit to a permit to construct. No other modifications were requested by the facility and the Tier II operating permit is being converted to a permit to construct in accordance with the DEQ's Standard Operating Procedure for converting Tier II operating permits to permits to construct.

Application Chronology

December 6, 2016	DEQ received an application and an application fee.
December 14, 2016	DEQ made available the draft permit and statement of basis for peer and regional office review.
January 4, 2017	DEQ made available the draft permit and statement of basis for applicant review.
December 6, 2016	DEQ received half of the permit processing fee.
January 10, 2017	DEQ received remainder of permit processing fee
January 13, 2017	DEQ issued the final permit and statement of basis.

TECHNICAL ANALYSIS

Emissions Units and Control Equipment

Table 1 EMISSIONS UNIT AND CONTROL EQUIPMENT INFORMATION

Source Description	Emissions Control Device	Emissions Discharge Point ID No. and/or Description
<u>Sand & gravel processing</u> <u>Primary Crusher and Screen</u> Manufacturer: Eljay Maximum capacity: 250 T/hr Maximum production: 400,000 T/yr Construction Date: 1988	BMP, water sprays, or equivalent methods	N/A
<u>Concrete batch plant – ready mix</u> Mfr.: Erie Strayer Model: A5-5422 Year of mfr.: 1979 Maximum capacity: 150 cy/hr Maximum production: 1500 cy/day, 300,000 cy/yr Requested throughput limit: 200,000 cy/yr	<u>Cement Storage Silo Baghouse No. 1</u> Mfr.: McNeilus Model: CJP 450 Control efficiency: 95 %	<u>Cement Storage Silo Baghouse No. 1</u> Exit height: 70 ft (21.3 m) Exit diameter: 0.277 ft (0.084 m) Exit air flow rate: 600 acfm
	<u>Cement Storage Silo Baghouse No. 2</u> Mfr.: McNeilus Model: SFU-270 Control efficiency: 95 %	<u>Cement Storage Silo Baghouse No. 2</u> Exit height: 70 ft (21.3 m) Exit diameter: 0.34 ft (0.10 m) Exit air flow rate: 550 acfm
	<u>Cement Supplement Storage Silo Baghouse No. 3</u> Mfr.: McNeilus Model: SFV-270 Control efficiency: 99.6 %	<u>Cement Supplement Storage Silo Baghouse No. 3</u> Exit height: 70 ft (21.3 m) Exit diameter: 0.34 ft (0.103 m) Exit air flow rate: 550 acfm
	<u>Weigh batcher Baghouse No. 3</u> Mfr.: Hydro Search Model: PJ-4400 Control efficiency: 99.9%	<u>Weigh Batchers Vent Baghouse No. 3</u> Exit height: 30 ft (0.305) Exit diameter: 1 ft (9.14 m) Exit air flow rate: 3,000 acfm
<u>Generator</u> Mfr.: Cummins Onan Mfr Year: 2006 Model: NTA-855-62 Generator Rating: 461 bhp Fuel type: diesel Max. operational hours per day: 24 hrs/day Max. operational hours per year: 4,000 hrs/yr	None	N/A

Emissions Inventory

An emission inventory was developed for the sand and gravel processing, concrete batch plant, and generator and is contained in the T2-2007.0084 Statement of Basis dated June 16, 2010 (2009AAG5892[v3]). For this permitting action of converting the permit from T2 to PTC, toxic, hazardous, and criteria emissions have not changed.

Regulatory Review

There are no newly applicable state or federal requirements. NESHAP 40 CFR 63 Subpart ZZZZ has changed since the issuance of T2-2007.0084; however, after review of the current revision of this subpart, no changes affecting the current permit conditions are noted for conversion to permit to construct. The Regulatory Review provided in the June 16, 2010 T2-2007.0084 Statement of Basis that supports issuance of the Tier II operating permit does not change as a result of changing this Tier II operating permit to a permit to construct and is not repeated in this statement of basis.

Ambient Air Quality Impact Analyses

No modeling is required for this permitting action because there is no emissions increase.

Permit Conditions Review

This section describes the permit conditions for this initial permit or only those permit conditions that have been added, revised, modified or deleted as a result of this permitting action.

There are no new permit conditions resulting from this permit action, and “SOP – Existing T2 to PTC Conversion” internal guidance document was followed.

PUBLIC REVIEW

Public Comment Opportunity

Because this permitting action does not authorize an increase in emissions, an opportunity for public comment period was not required or provided in accordance with IDAPA 58.01.01.209.04 or IDAPA 58.01.01.404.04.

APPENDIX A – FEE CALCULATION

PTC Fee Calculation

Instructions:

Fill in the following information and answer the following questions with a Y or N. Enter the emissions increases and decreases for each pollutant in the table.

Company: Walters Ready Mix
 Address: 342 West 4th North
 City: Rexburg
 State: ID
 Zip Code: 83440
 Facility Contact: James Walters
 Title: Manager
 AIRS No.: 065-0004

☐ N ☐ Does this facility qualify for a general permit (i.e. concrete batch plant, hot-mix asphalt plant)? Y/N

☐ Y ☐ Did this permit require engineering analysis? Y/N

☐ N ☐ Is this a PSD permit Y/N (IDAPA 58.01.01.205.04)

Emissions Inventory			
Pollutant	Annual Emissions Increase (T/yr)	Annual Emissions Reduction (T/yr)	Annual Emissions Change (T/yr)
NO _x	0.0	0	0.0
SO ₂	0.0	0	0.0
CO	0.0	0	0.0
PM10	0.0	0	0.0
VOC	0.0	0	0.0
TAPS/HAPS	0.0	0	0.0
Total:	0.0	0	0.0
Fee Due	\$ 1,000.00		

Comments: Changes to the Subpart ZZZZ required that a review of that subpart was necessary before issuing a PTC